

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

v.

YANPING WANG,

Defendant.

23 Cr. 118-3 (AT)

**DECLARATION OF BRENDAN F. QUIGLEY IN SUPPORT OF  
DEFENDANT'S PRE-TRIAL MOTIONS**

I, Brendan F. Quigley, declare and state as follows:

1. I am a partner with the law firm Baker Botts, L.L.P. and counsel for defendant Yanping Wang in this action. I submit this declaration upon my personal knowledge in support of Ms. Wang's pre-trial motions.

2. Attached hereto as Exhibit 1 is the search warrant affidavit for 188 East 64th Street, Apartment 1601, New York, N.Y. 10065, dated March 14, 2023, which was produced by the government in this case and is filed under seal.

3. Attached hereto as Exhibit 2 is a Federal Bureau of Investigation 302 Report, dated March 20, 2023, which was produced by the government in this case and is filed under seal.

4. Attached hereto as Exhibit 3 is a Federal Bureau of Investigation 302 Report, dated April 6, 2023, which was produced by the government in this case and is filed under seal.

5. Attached hereto as Exhibit 4 is a true and correct copy of the declaration of Yanping Wang, dated December 11, 2023.

6. Attached hereto as Exhibit 5 is a true and correct copy of a letter from Ms. Wang's prior counsel to the government, dated July 31, 2023.

7. Attached hereto as Exhibit 6 is a true and correct copy of an email from the government to me, dated December 8, 2023.

8. Attached hereto as Exhibit 7 is a true and correct copy of a letter from the government to Ms. Wang's counsel and counsel for Mr. Ho Wan Kwok, dated December 11, 2023, filed under seal.

9. Attached hereto as Exhibit 8 is a search warrant for 188 East 64th Street, Apartment 1601, New York, N.Y. 10065, dated March 14, 2023, which was produced by the government in this case and is filed under seal.

Pursuant to 28 U.S.C. § 1746, I, Brendan F. Quigley, declare under penalty of perjury that the foregoing is true and correct.

Executed in New York, New York on this 15th day of December, 2023.

/s/ Brendan F. Quigley  
Brendan F. Quigley